

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

STATE OF CALIFORNIA
WATER RESOURCES CONTROL BOARD
DIVISION OF DRINKING WATER

TO: Travis Air Force Base Water System
60 AMW/CC 400 Brennan Circle
Travis Air Force Base, CA 94535-5000

Attn: Colonel Joel Jackson, Commander
60th Air Mobility Wing
Travis Air Force Base

CITATION FOR VIOLATION OF CALIFORNIA CODE OF REGULATIONS, TITLE
22, SECTION 64533(a) - WATER SYSTEM NO. 4100533

C I T A T I O N N O . 0 2 _ 0 4 _ 1 5 C _ 0 1 4

Issued on December 22, 2015

Section 116650 of the California Health and Safety Code authorizes the issuance of a citation to a public water system for violation of the California Safe Drinking Water Act (Health and Safety Code, Division 104, Part 12, Chapter 4, commencing with Section 116270) (California SDWA), or any regulation, standard, permit or order issued or adopted thereunder.

The State Water Resources Control Board, acting by and through its Division of Drinking Water (Division) and the Deputy Director for the Division (Deputy Director), hereby issues a citation to Travis Air Force Base Water System (Travis AFB)



1
2 (60 AMW/CC 400 Brennan Circle, Travis AFB, CA 94535-5000) for violation of
3 California Code of Regulations (CCR), Title 22, Section 64533 subsection (a).

4 **APPLICABLE AUTHORITIES**

5 **Section 116650 of California Health and Safety Code provides:**

6 (a) If the Division determines that a public water system is in violation of this
7 chapter or any regulation, permit, standard, citation, or order issued or adopted
8 thereunder, the department may issue a citation to the public water system.
9 The citation shall be served upon the public water system personally or by
10 certified mail. Service shall be deemed effective as of the date of personal
11 service or the date of receipt of the certified mail. If a person to whom a citation
12 is directed refuses to accept delivery of the certified mail, the date of service
13 shall be deemed to be the date of mailing.

14 (b) Each citation shall be in writing and shall describe the nature of the violation
15 or violations, including a reference to the statutory provision, standard, order,
16 citation, permit, or regulation alleged to have been violated.

17 (c) A citation may specify a date for elimination or correction of the condition
18 constituting the violation.

19 (d) A citation may include the assessment of a penalty as specified in
20 subdivision (e).

21 (e) The Division may assess a penalty in an amount not to exceed one
22 thousand dollars (\$1,000) per day for each day that a violation occurred, and
23 for each day that a violation continues to occur. A separate penalty may be
24 assessed for each violation.

1 California Code of Regulations, Title 22, Section 64533, subsection (a) provides,
2
3 in relevant part:

4 (a) Using the monitoring and calculation methods specified in sections 64534,
5 64534.2, 64535, and 64535.2, the primary MCLs for the disinfection byproducts
6 shown in table 64533-A shall not be exceeded in drinking water supplied to the
7 public.

8
9 **Table 64533-A**

Maximum Contaminant Levels and Detection Limits for
Purposes of Reporting Disinfection Byproducts

	<i>Maximum</i>	<i>Detection Limit for</i>
	<i>Contaminant</i>	<i>Purposes of Reporting</i>
<u>Disinfection Byproduct</u>	<u>Level (mg/L)</u>	<u>(mg/L)</u>
Total trihalomethanes (TTHM)	0.080	
Bromodichloromethane		0.0010
Bromoform		0.0010
Chloroform		0.0010
Dibromochloromethane		0.0010

17
18 **STATEMENT OF FACTS**

19
20 The Travis AFB water system is operated under Water Supply Permit No. 02-04-97P-
21 4810701, issued on May 8, 1997. Travis AFB is under the operational control of the
22 United States Air Force 60th Air Mobility Wing (AMW). The 60th AMW is responsible
23 for strategic airlift and air refueling missions circling the globe. The unit's primary
24 roles are to provide rapid, reliable airlift of American fighting forces anywhere in the
25 world in support of national objectives and to extend the reach of American and allied
26 air power through mid-air refueling. The Travis AFB is located three miles east of the
27 central business district of the City of Fairfield in Solano County.

1
2
3 Travis AFB has a contract with the City of Vallejo to purchase treated water from the
4 City of Vallejo Travis WTP and pays for the cost incurred by the City of Vallejo for
5 operating and maintaining the Travis WTP. The City of Vallejo is permitted by the
6 Division of Drinking Water to operate and maintain the Travis WTP and supply treated
7 water to the Travis AFB (Permit No. 02-04-94-4810015, issued on December 13,
8 1994). The Travis AFB has its own well supply sources and distribution system that
9 supply the remaining demand 20% and are operated and maintained by Travis AFB
10 operations staff.

11 12 Surface Sources of Supply and Treatment Provided by Travis WTP

13 The Travis WTP has two surface supply sources, North Bay Aqueduct Water (NBA)
14 and Putah South Canal (PSC). The NBA water originates from Barker Slough, a
15 tributary to the Sacramento River in Eastern Solano County, and is pumped by the
16 Barker Slough Pump Station (which owned and operated by DWR as part of the State
17 Water Project to the Travis WTP. The Putah South Canal receives water from Putah
18 Creek below Lake Berryessa and the Monticello Dam. PSC water flows to Cordelia
19 Reservoir where it is pumped to Travis WTP. The raw water sources are not blended,
20 therefore, the plant treats either 100 per cent PSC water or 100 percent NBA water.

21 The existing Travis WTP provides conventional treatment with coagulation,
22 flocculation, sedimentation pre-ozonation and dual media filtration with GAC and
23 sand, pre and post-chlorination for disinfection and for CT inactivation credit,
24 fluoridation, and pH adjustment.

25 26 Travis AFB Groundwater Sources and Treatment and Distribution System

27 Travis AFB has five wells designated for potable use (Wells 2029, 2037, 2038, 2040,
and 2041) that are operated and maintained by Travis AFB operations staff.



1 Chlorination and fluoridation treatment is provided at each well site. These wells have
2 been mainly used when the Travis WTP is down for maintenance. Travis AFB has
3 four potable main storage tanks with a total storage capacity of 10.5 mgd and a
4 600,000 gallon tank that serves the on base hospital. The 600,000 gallon tank is
5 maintained by the hospital contract operators. There are also six tanks located in the
6 distribution system that are used for fire protection.
7

8 Population Served by Travis AFB

9

10 Travis AFB has a reported 2200 active service connections. Travis AFB has a
11 workforce of 13,414 personnel, which includes 7200 active-duty military members,
12 3096 Air Force Reservists, 1828 civil-service civilians and 1290 civilians funded by
13 contracts with private businesses. Travis AFB has about 920 dorm residents; 1266
14 family housing units with 4144 occupants; three elementary schools, two on base
15 (Scandia, 460 students; and Travis, 540 students) and one that was rezoned and is
16 now considered off base (Center Elementary, 470 students). There are three day
17 care centers with a total of 452 children and 15 home day care centers with 72
18 children. The Travis AFB also serves the David Grant USAF Medical Center which is
19 the largest medical facility on the west coast and currently serves 96,000 TRICARE
20 beneficiaries in the immediate San Francisco and Sacramento vicinity. TRICARE is
21 the health care system that provides civilian health care benefits for military
22 personnel, military retirees and their dependents. There are two military dining
23 facilities, including one that serves the David Grant Medical Center and 14 fast food
24 eateries and four delis that serve soup/sandwiches.
25

26 Pursuant to Title 22, CCR, Section 64534.2(a) (Disinfection Byproducts Rule
27 Monitoring), Travis AFB is required to collect a minimum of four distribution system
samples per quarter for Total Trihalomethanes (TTHM) and for Haloacetic Acids



1 (HAA5) since its receives treated surface water from the Travis WTP and serves a
2 population greater than 10,000 people. Travis AFB currently collects quarterly TTHM
3 and HAA5 samples from six locations based on its current approved TTHM/HAA5
4 Monitoring Plan. Under Title 22, CCR, Section 64535.2(b)(1), compliance with the
5 TTHM MCL of 0.080 mg/L (or 80 ug/l) is based on a running annual average,
6 calculated quarterly, for each monitoring location.
7

8
9 Travis AFB failed the TTHM standard at two locations after collecting 3rd quarter
10 samples during the month of September 2015. The two locations are Building
11 770/780 and Building 810.

12 The following is a summary of the TTHM running annual averages for the past four
13 quarters which covers a 12 month period from October 1, 2014 to September 30,
14 2015 at the Building 770/780 sample location.

15
16 **4th Quarter 2014:** A TTHM sample was collected on November 26, 2014 at Building
17 770. The TTHM level in the sample was 0.096 mg/L. The four quarter running annual
18 average was 0.061 mg/l and in compliance with the TTHM MCL.

19
20 **1st Quarter 2015:** Travis AFB collected a sample at Building 770 on February 2015
21 for TTHM analysis. The TTHM level in the sample was 0.110 mg/L. The four quarter
22 running annual average was 0.075 mg/l and in compliance with TTHM MCL.

23
24 **2nd Quarter 2015:** Travis AFB collected a sample on June 1, 2015 at Building 770.
25 The TTHM level was 0.053 mg/l. The four quarter running annual average was 0.073
26 mg/l and in compliance with the TTHM MCL.

27 **3rd Quarter 2015:** Travis AFB collected a sample on September 28, 2015 at Building
780. The TTHM level was 0.100 mg/l. The resultant four quarter running average



1 was 0.090 mg/L. Based on these results, Travis AFB was in violation of the TTHM
2 MCL at the sample location Building 770/780.
3

4
5 The following is a summary of the TTHM running annual averages for the past four
6 quarters which covers a 12 month period from October 1, 2014 to September 30,
7 2015 at the Building 810 sample location.

8
9 **4th Quarter 2014:** A TTHM sample was collected on November 26, 2014 at Building
10 810. The TTHM level in the sample was 0.069 mg/L. The four quarter running annual
11 average was 0.040 mg/l and in compliance with the TTHM MCL.

12
13 **1st Quarter 2015:** Travis AFB collected a sample at Building 810 on February 2015
14 for TTHM analysis. The TTHM level in the sample was 0.076 mg/L. The four quarter
15 running annual average was 0.049 mg/l and in compliance with the TTHM MCL.

16
17 **2nd Quarter 2015:** Travis AFB collected a sample on June 1, 2015 at Building 810.
18 The TTHM level was 0.076 mg/l. The four quarter running annual average was 0.060
19 mg/l and in compliance with the TTHM MCL.

20
21 **3rd Quarter 2015:** Travis AFB collected a sample on September 28, 2015 at Building
22 810. The TTHM level was 0.110 mg/L. The resultant four quarter running annual
23 average was 0.083 mg/L. Based on these results, Travis AFB was in violation of the
24 TTHM MCL at the sample location Building 810.

25
26 **DETERMINATION**

27 The Division has determined that Travis AFB failed to comply with the Maximum
Contaminant Level (MCL) for total trihalomethanes (TTHM) at two locations, Building



1 770/780 and Building 810 site for the four-quarter monitoring period of October 1,
2 2014 through September 30, 2015. For a public water system monitoring quarterly,
3 each locational running annual average (LRAA), computed quarterly, shall not exceed
4 the MCL of 0.080 mg/L for total trihalomethanes, consisting of chloroform,
5 bromodichloromethane, dibromochloromethane, and bromoform. The TTHM LRAA
6 for the four-quarter monitoring period of October 1, 2014 through September 30,
7 2015, was 0.090 mg/L at the Building 770/780 sample site and 0.083 mg/l at Building
8 810 sample site.
9

10 Travis AFB conducted the required public notification on November 20, 2015 in
11 conformance with Section 64463, Chapter 15, Title 22, CCR. The public notice was
12 reviewed and approved by the Division on November 13, 2015 prior to distribution.
13

14 DIRECTIVES

15 Travis AFB is hereby directed to take the following actions:
16

- 17 1. Travis AFB shall cease and desist from failing to comply with the MCL for total
18 trihalomethanes (TTHM).
19
- 20 2. Complete and return the attached Proof of Public Notification Form.
21
- 22 3. Travis AFB shall include information regarding the TTHM MCL violation identified
23 in this Citation in the 2015 Consumer Confidence Report, which must be
24 completed and distributed by July 1, 2016. A draft of the 2015 Consumer
25 Confidence Report shall be submitted to the Division for review and approval prior
26 to distribution and/or posting.
27



1 4. Prepare and submit a Corrective Action Plan (CAP). The plan shall include an
2 evaluation of the causes that led to TTHM failure and specific actions that will take
3 to return the water system to compliance in the near term and in the future. The
4 Corrective Action Plan shall be submitted to the Division by January 31, 2016.
5

6 All submittals required by this Citation shall be submitted to the Division at the
7 following address:
8

9 Robert Brownwood, P.E.
10 San Francisco District Engineer
11 Division of Drinking Water
12 State Water Resources Control Board
13 850 Marina Bay Parkway
14 Building P, 2nd Floor
15 Richmond, CA 94804-6403
16

17 **PARTIES BOUND**

18 This Citation shall apply to and be binding upon Travis AFB, its officers, directors,
19 shareholders, agents, employees, contractors, successors, and assignees.
20

21 **SEVERABILITY**

22 The Directives of this Citation are severable, and Travis AFB shall comply with each
23 and every provision thereof, notwithstanding the effectiveness of any other provision.
24

25 **FURTHER ENFORCEMENT ACTION**

26 The California SDWA authorizes the Division to: issue citation with assessment of
27 administrative penalties to a public water system for violation or continued violation of
the requirements of the California SDWA or any permit, regulation, permit or order
issued or adopted thereunder including, but not limited to, failure to correct a violation
identified in a citation or compliance order. The California SDWA also authorizes the



1 Division to take action to suspend or revoke a permit that has been issued to a public
2 water system if the system has violated applicable law or regulations or has failed to
3 comply with an order of the Division; and to petition the superior court to take various
4 enforcement measures against a public water system that has failed to comply with
5 violates an order of the Division. The Division does not waive any further enforcement
6 action by issuance of this citation.
7

8
9
10
11
12 December 22, 2015

13 Date

Robert C. Brownwood

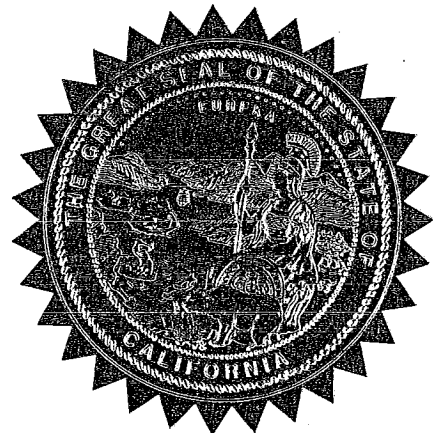
14 Robert Brownwood, P.E.,
15 San Francisco District Engineer
16 Division of Drinking Water
17 State Water Resources Control Board

18 Attachment:

19 1. Proof of Notification Certification

20 cc: Solano County Environmental Health Department

21 Certified Mail No. 7014 3490 001 7031 0727
22
23
24
25
26
27



ATTACHMENT 1

PROOF OF COMPLIANCE
Citation Number 02_04_15C_014
Travis Air Force Base
System Number: 4810701

As required by Section 116450 of the California Health and Safety Code, Travis AFB notified its consumers that the water supplied by the Travis Air Force Base (Travis AFB) Water System during the 3rd quarter period in 2015 (July 1, 2015 – September 30, 2015) exceeded the Total Trihalomethane (TTHM) maximum contaminant level at two locations (Building 770/780 and Building 810) as specified in Section 64535.2(b)(1), Chapter 15, Title 22, California Code of Regulations, violation based on a running annual average for the four-quarter monitoring period of October 1, 2014 through September 30, 2015.

Travis AFB complied with the directives of this citation as indicated below:

Required Action

Date Completed

1. Public notification

a. Mail or direct delivery

b. Posting in conspicuous places

Signature of Water System Representative

Date

**THIS FORM MUST BE COMPLETED AND RETURNED TO THE DEPARTMENT. A COPY
OF THE DELIVERED OR MAILED NOTICE MUST BE ATTACHED TO THIS FORM**

Disclosure: Be advised that Section 116725 and 116730 of the California Health and Safety Code states that any person who knowingly makes any false statement on any report or document submitted for the purpose of compliance with the attached citation may be liable for a civil penalty not to exceed five thousand dollars (\$5,000) for each separate violation for each day that violation continues. In addition, the violators may be prosecuted in criminal court and upon conviction, be punished by a fine of not more than \$25,000 for each day of violation, or be imprisoned in county jail not to exceed one year, or by both the fine and imprisonment.